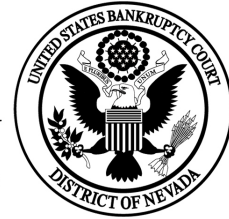




Honorable Mike K. Nakagawa  
United States Bankruptcy Judge



Entered on Docket  
July 11, 2023

BRETT A. AXELROD, ESQ.  
Nevada Bar No. 5859  
NICHOLAS A. KOFFROTH, ESQ.  
Nevada Bar No. 16264  
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*Counsel for Debtor*

**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEVADA**

In re

CASH CLOUD, INC.,  
dba COIN CLOUD,

Debtor.

Case No. BK-23-10423-mkn

Chapter 11

**ORDER ESTABLISHING  
ADMINISTRATIVE CLAIM BAR  
DATE FOR FILING PROOFS OF  
ADMINISTRATIVE EXPENSE CLAIM  
AND APPROVING FORM, MANNER  
AND SUFFICIENCY OF NOTICE  
THEREOF**

Hearing Date: July 7, 20203

Hearing Time: 10:00 a.m.

FOX ROTHSCHILD LLP  
1980 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135  
(702) 262-6899  
(702) 597-5503 (fax)

Upon the motion (the “Motion”)<sup>1</sup> of the Debtor in the above-captioned Chapter 11 Case for the entry of an order (i) establishing an Administrative Claim Bar Date by which Administrative Claim Creditors must file a Proof of Administrative Expense Claim, using a form substantially similar to the Administrative Proof of Claim Form, attached hereto as **Exhibit 1**, and in accordance with the substantive requirements described in the Administrative Claim Bar Date Notice, attached hereto as **Exhibit 2**; and (ii) approving the form and manner of notice of the Administrative Claim Bar Date; and the Court finding that: (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) this matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and (c) notice of the Motion was due and proper under the circumstances; and it appearing that the relief requested in the Motion is in the best interests of the Debtor, its estate, its creditors, and other parties-in-interest; after due deliberation; and good and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED** as follows:

1. The Motion is GRANTED, as provided herein.
2. Each person or entity, including governmental units, holding or asserting an administrative expense claim against the Debtor that accrued or arose on or between the Petition Date and July 20, 2023 (the “Interim Period”) must file with the Clerk of the Bankruptcy Court for the District of Nevada a Proof of Administrative Expense Claim, substantially similar in form to the Administrative Proof of Claim Form, attached hereto as **Exhibit 1**, no later than 5:00 p.m. (prevailing Pacific Time) on July 20, 2023 (the “Administrative Claim Bar Date”).
3. The form of the Administrative Proof of Claim Form attached hereto as **Exhibit 1** is approved.
4. In accordance with Fed. R. Bankr. P. 9007, the form of the Administrative Claim Bar Date Notice, attached hereto as **Exhibit 2**, is approved.
5. Debtor shall serve the Administrative Claim Bar Date Notice within one business day of entry of this Order (the “Service Date”) by first-class United States Mail, postage prepaid, to

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

all of the following whose addresses are known by Debtor:

- a. the creditors reflected in the Debtor's schedules;
- b. all employees of the Debtor during the six months leading up to the Petition Date;
- c. all of the Debtor's known creditors;
- d. all other parties-in-interest as required by Bankruptcy Rules 2002(f), (j), and (1); and
- e. those additional federal and state governmental entities and units listed in the Register and Mailing Addresses of Federal and State Governmental Units kept by the clerk under Fed. R. Bankr. P. 5003(e) and LR 5003(c).

6. A Proof of Administrative Expense Claim will be deemed timely and properly filed if it is filed with the Bankruptcy Court and served upon the Notice Parties at the following addresses no later than the Administrative Claim Bar Date as established by this Order: (a) counsel to Debtor, Fox Rothschild LLP, 1980 Festival Plaza Drive, Suite 700, Las Vegas, Nevada 89135, Attn: Brett Axelrod; (b) counsel to DIP Lender, (i) Berger Singerman LLP, 1450 Brickell Avenue, Suite 1900, Miami, FL 33131, Attn: Jordi Gusó, and (ii) Sylvester & Polednak Ltd., 1731 Village Center Circle, Las Vegas, NV 89134, Attn: Jeffrey R. Sylvester; (c) counsel to Genesis Global Holdco, LLC, Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, NY 10006, Attn: Sean A. O'Neal and Jane VanLare; (d) counsel to Enigma Securities Limited, (i) Morrison & Foerster LLP, 250 West 55<sup>th</sup> Street, New York, NY 10019, Attn: Gary S. Lee and Andrew Kissner, and (ii) Shea Larsen, 1731 Village Center Circle, Suite 150, Las Vegas, NV 89134, Attn: James Patrick Shea; (e) counsel to the Committee of Unsecured Creditors (the "Committee"), (i) Seward & Kissel LLP, One Battery Park Plaza, New York, New York 10004, Attn: John R. Ashmead and Robert J. Gayda, and (ii) McDonald Carano Wilson LLP, 2300 W. Sahara Ave., Suite 1200, Las Vegas, NV 89102 Attn: Ryan J. Works, and (f) the Office of the United States Trustee, 300 Las Vegas Boulevard S., Suite 4300, Las Vegas, NV 89101, Attn: Jared A. Day.

7. A Proof of Administrative Expense Claim is deemed filed when filed with or received by the Clerk of the Bankruptcy Court (not the date of the postmark, if applicable). Holders of administrative expense claims are only permitted to file a Proof of Administrative Expense Claim with the Clerk of the Bankruptcy Court in person, by courier service, overnight delivery, or by first-

class U.S. Mail; facsimile, telecopy, email or other electronic mail submissions of a Proof of Administrative Expense Claim are not acceptable and will not be deemed properly filed.

8. The following persons or entities are not required to file a Proof of Administrative Expense Claim on or before the Administrative Claim Bar Date:

- a. Administrative claims based upon liabilities that the Debtor incurs in the ordinary course of its business to providers of goods and services;
- b. Any and all claims of a Professional<sup>2</sup> seeking an award by the Bankruptcy Court of compensation for services rendered or reimbursement of expenses incurred under sections 326, 330, 331, 503(b)(2), 503(b)(3), 503(b)(4) or 503(b)(5) of the Bankruptcy Code;
- c. Administrative claims arising out of the employment by the Debtor of an individual from and after the Petition Date, but only to the extent that such administrative claim is solely for outstanding wages, commissions, or reimbursement of business expenses; and
- d. the fees and charges assessed against the Debtor's estate, pursuant to 28 U.S.C. § 1930, including such fees or charges assessed against the Debtor's estate by the Office of the United States Trustee for the District of Nevada.

9. If a holder of an administrative expense claim fails to timely file a completed Proof of Administrative Expense Claim in this Chapter 11 Case in compliance with the above procedures and deadlines established by this Order, such claimant shall be forever barred, estopped, and enjoined from asserting any administrative expense claim against Debtor.

10. The provision and manner of notice of the Administrative Claim Bar Date as set forth in this Order constitutes adequate and sufficient notice of the Administrative Claim Bar Date and is deemed to satisfy all applicable notice requirements.

11. The Debtor is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

12. The terms and conditions of this Order shall be immediately effective and enforceable upon entry of the Order.

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<sup>2</sup> **“Professional”** means (a) any professional employed in the Chapter 11 Case pursuant to an order issued under sections 327 or 1103 of the Bankruptcy Code or otherwise, and (b) any and all professionals or other entities seeking compensation or reimbursement of expenses in connection with the Chapter 11 Case pursuant to section 503(b)(4) of the Bankruptcy Code

13. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

14. Debtor shall retain the right to dispute, or to assert offsets or defenses against, any Administrative Expense Claim, and nothing contained in the Administrative Claim Bar Date Notice or this Order shall preclude the Debtor from objecting to any filed Administrative Expense Claim on any grounds.

15. This Court shall and hereby does, retain jurisdiction with respect to all matters arising from, or in relation to the implementation of this Order.

Prepared and respectfully submitted by:

**FOX ROTHSCHILD LLP**

By: /s/Brett Axelrod  
BRETT A. AXELROD, ESQ.  
Nevada Bar No. 5859  
NICHOLAS A. KOFFROTH, ESQ.  
Nevada Bar No. 16264  
ZACHARY T. WILLIAMS, ESQ.  
Nevada Bar No. 16023  
1980 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135  
*Counsel for Debtor*

FOX ROTHSCHILD LLP  
1980 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135  
(702) 262-6899  
(702) 597-5503 (fax)

**CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE 9021**

In accordance with Local Rule 9021, counsel submitting this document certifies as follows:

- ☐ The Court has waived the requirement of approval in LR 9021(b)(1).
- ☒ No party appeared at the hearing or filed an objection to the motion
- ☐ I have delivered a copy of this proposed order to all counsel who appeared at the hearing, any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below:

- ☐ I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of the order.

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**EXHIBIT 1**

**ADMINISTRATIVE PROOF OF CLAIM FORM**

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA		ADMINISTRATIVE CLAIM FORM
In re: <b>Cash Cloud, Inc.</b>	Case No. <b>23-10423-mkn</b>	<b>PLEASE NOTE:</b>  <i>This form should only be used to assert an administrative expense claim that arose or accrued after February 6, 2023, but before July 21, 2023.</i>  <b>THIS SPACE IS FOR COURT USE ONLY</b>
	<input type="checkbox"/> Check box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars.	
<b>Name of Creditor and Address:</b> the person or other entity to whom the debtor owes money or property	<input type="checkbox"/> Check box if you have never received any notices from the bankruptcy court in this case.  <input type="checkbox"/> Check box if the address differs from the address on the envelope sent to you by the court.	
Creditor Telephone Number (    )		
Name and address where notices should be sent (if different from above):		
Creditor Telephone Number (    )		
Account or other number by which creditor identifies debtor:	Check here if this claim: <input type="checkbox"/> replaces <input type="checkbox"/> amends a previously filed claim, dated:	
<b>1. Basis for Claim:</b>		
<b>2. Date debt was incurred:</b> _____		
<b>3. Brief description of claim, including the basis for the priority nature of the claim (if any) (attach additional information):</b>		
<b>4. Total Amount of Administrative Claim:</b> \$ _____ <input type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of the claim. Attach itemized statement of all interest or additional charges.		
<b>5. CREDITS:</b> The amount of all payments on this claim has been credited for the purpose of making this proof of claim.		
<b>6. SUPPORTING DOCUMENTS:</b> <u>Attach copies of supporting documents</u> , such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, court documents, mortgages security agreements, and evidence of perfection of lien. DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, explain. If the documents are voluminous, attach a summary.		
<b>7. DATE-STAMPED COPY:</b> To receive an acknowledgement of the filing of your claim, enclose a stamped self-addressed envelope and copy of this proof of claim.		
The original of this completed proof of claim form must be filed electronically on or before 5:00 p.m. Prevailing Pacific Time on July 20, 2023 through the Court's CM/ECF System or mailed to the address below <u>so that it is received</u> by the Clerk of the Bankruptcy Court for the District of Nevada at the address below on or before 5:00 pm Prevailing Pacific Time on July 20, 2023.  Clerk of the United States Bankruptcy Court, District of Nevada 300 Las Vegas Blvd. South, Las Vegas, NV 89101		<b>THIS SPACE IS FOR COURT USE ONLY</b>
<b>DATE</b>	<b>SIGNATURE:</b> The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.	

Penalty for presenting fraudulent claim is a fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 AND 3571.

## INSTRUCTIONS FOR FILING PROOF OF ADMINISTRATIVE CLAIM

*The instructions and definitions below are general explanations of the law. In certain circumstances, such as bankruptcy cases not filed voluntarily by the debtor, there may be exceptions to these general rules.*

***This form should only be used to assert administrative claims arising or accruing after February 6, 2023, but prior to July 21, 2023.***

1. Please read this Administrative Claim form carefully and fill it in completely and accurately.
2. Print legibly. Your claim may be disallowed if it cannot be read and understood.
3. This Administrative Claim must be completed in English. The amount of any Administrative Claim must be denominated in United States currency.
4. Attach additional pages on 8-1/2 x 11" paper if more space is required to complete this Administrative Claim form.
5. **THIS FORM SHOULD ONLY BE USED BY A CLAIMANT ASSERTING AN ADMINISTRATIVE EXPENSE THAT AROSE OR ACCRUED AFTER FEBRUARY 6, 2023, BUT PRIOR TO JULY 21, 2023. THIS FORM IS NOT FOR FILING CLAIMS ARISING OR ACCRUING AFTER JULY 20, 2023.**
6. This Administrative Claim form should be filed electronically on or before 5:00 Prevailing Pacific Time on July 20, 2023 through the Court's CM/ECF System, or mailed to the following address so that it is **received** by the Clerk of the United States Bankruptcy Court at the address below on or before 5:00 p.m. Prevailing Pacific Time on July 20, 2023.

Clerk of the United States Bankruptcy Court, District of Nevada  
300 Las Vegas Blvd. South, Las Vegas, NV 89101

7. **THE CLAIMANT MUST ATTACH COPIES OF ANY AND ALL SUPPORTING DOCUMENTATION THAT PROVIDES EVIDENCE THAT THIS CLAIM IS FOR AN OBLIGATION THAT AROSE OR ACCRUED AFTER FEBRUARY 6, 2023, BUT PRIOR TO JULY 21, 2023, SUCH AS PROMISSORY NOTES, PURCHASE ORDERS, INVOICES, ITEMIZED STATEMENTS OF ACCOUNTS, CONTRACTS, COURT JUDGMENTS, OR EVIDENCE OF A SECURITY INTEREST. IF THE DOCUMENTATION IS NOT ATTACHED, THE DEBTOR MAY SEEK DISALLOWANCE OF YOUR CLAIM.**
8. To be considered timely filed, this Administrative Claim form must be filed with the Bankruptcy Court (either through the Court's CM/ECF System or by mailing it to the Clerk of the United States Bankruptcy Court as set forth above) by 5:00 p.m. (Prevailing Pacific Time) on July 20, 2023, and should include appropriate documentation/materials establishing the claimant's entitlement to an allowed Administrative Claim and the amount of the asserted claim.

**EXHIBIT 2**

**ADMINISTRATIVE CLAIM BAR DATE NOTICE**

Electronically Filed \_\_\_\_\_, 2023

BRETT A. AXELROD, ESQ.

Nevada Bar No. 5859

NICHOLAS A. KOFFROTH, ESQ.

Nevada Bar No. 16264

ZACHARY T. WILLIAMS, ESQ.

Nevada Bar No. 16023

**FOX ROTHSCHILD LLP**

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Email: baxelrod@foxrothschild.com

nkoffroth@foxrothschild.com

zwilliams@foxrothschild.com

*Counsel for Debtor*

**UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF NEVADA**

In re

CASH CLOUD, INC.,  
dba COIN CLOUD,

Debtor.

Case No. BK-23-10423-mkn

Chapter 11

**NOTICE OF ENTRY OF  
ADMINISTRATIVE CLAIM BAR DATE  
ORDER ESTABLISHING A DEADLINE  
TO FILE ADMINISTRATIVE EXPENSE  
CLAIMS AGAINST THE DEBTOR**

**PLEASE TAKE NOTICE**, that Cash Cloud, Inc. dba Coin Cloud ("Debtor"), debtor and debtor in possession in the above-captioned case (the "Chapter 11 Case"), by and through its counsel, Fox Rothschild LLP, hereby sets an Administrative Claim Bar Date of **July 20, 2023 at 5:00 p.m. Pacific Time** by which all persons and entities, who seek to file an administrative expense claim, pursuant to Section 507(a)(2) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et. seq.* (as amended, the "Bankruptcy Code"), must file requests for payment and proof of their claims in accordance with the deadlines and procedures described below.

**THIS NOTICE DESCRIBES IMPORTANT DEADLINES AND PROCEDURES THAT AFFECT YOUR LEGAL RIGHTS. YOU MAY WISH TO CONSULT WITH AN**

# ATTORNEY TO PROTECT YOUR RIGHTS.

On February 7, 2023 (the “**Petition Date**”), Cash Cloud, Inc., dba Coin Cloud (the “**Debtor**”) filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Nevada (the “**Bankruptcy Court**”). More information on the Debtor’s case (the “**Chapter 11 Case**”), the Bankruptcy Court’s docket sheet, and documents filed in this case are accessible electronically at [www.nvb.uscourts.gov](http://www.nvb.uscourts.gov), the official website for the Court, at the website for the Debtor’s claims agent Stretto, Inc. at <https://cases.stretto.com/CashCloud>, or <https://ecf.nvb.uscourts.gov> through an account obtained from the PACER Service Center.

Pursuant to an order of the Bankruptcy Court dated \_\_\_\_\_, 2023 [Docket No. \_\_\_\_] (the “**Administrative Claim Bar Date Order**”), the Bankruptcy Court has established **5:00 p.m. (prevailing Pacific Time) on July 20, 2023** (the “**Administrative Claim Bar Date**”) as the deadline for all persons and entities, including governmental units but excluding those listed below, to assert administrative expense claims (each an “**Administrative Expense Claim**”) against the Debtor that arose or accrued after the Petition Date through and including the Administrative Claim Bar Date (the “**Interim Period**”).

In order to assert an Administrative Expense Claim, parties must submit a proof of claim form substantially similar to the attached proof of claim form (each a “**Proof of Administrative Expense Claim**”), with original signature and supporting documentation, so that such Proof of Administrative Expense Claim is filed with the Bankruptcy Court and served upon the following parties on or before the Administrative Claim Bar Date at: (a) counsel to Debtor, Fox Rothschild LLP, 1980 Festival Plaza Drive, Suite 700, Las Vegas, Nevada 89135, Attn: Brett Axelrod; (b) counsel to DIP Lender, (i) Berger Singerman LLP, 1450 Brickell Avenue, Suite 1900, Miami, FL 33131, Attn: Jordi Guso, and (ii) Sylvester & Polednak Ltd., 1731 Village Center Circle, Las Vegas, NV 89134, Attn: Jeffrey R. Sylvester; (c) counsel to Genesis Global Holdco, LLC, Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, NY 10006, Attn: Sean A. O’Neal and Jane VanLare; (d) counsel to Enigma Securities Limited, (i) Morrison & Foerster LLP, 250 West 55<sup>th</sup> Street, New York, NY 10019, Attn: Gary S. Lee and Andrew Kissner, and (ii) Shea Larsen, 1731 Village Center Circle, Suite 150, Las Vegas, NV 89134, Attn: James Patrick Shea; (e) counsel to the Committee of Unsecured Creditors (the “**Committee**”), (i) Seward & Kissel LLP, One Battery Park Plaza, New York, New York 10004, Attn: John R. Ashmead and Robert J. Gayda, and (ii) McDonald Carano Wilson LLP, 2300 W. Sahara Ave., Suite 1200, Las Vegas, NV 89102 Attn: Ryan J. Works, and (f) the Office of the United States Trustee, 300 Las Vegas Boulevard S., Suite 4300, Las Vegas, NV 89101, Attn: Jared A. Day (collectively, the “**Notice Parties**”).

Any person or entity that holds or asserts an Administrative Expense Claim or a potential Administrative Expense Claim against the Debtor, no matter how remote or contingent, that arose during the Interim Period must file a Proof of Administrative Expense Claim on or before the Administrative Claim Bar Date.

Proofs of Administrative Expense Claim will be deemed timely filed if actually received by the Clerk of the Bankruptcy Court and the Notice Parties on or before the Administrative Claim Bar Date. Further, the Bankruptcy Court will not accept Proofs of Administrative Expense Claim sent by facsimile, telecopy, e-mail, or other electronic submission, and such claims will not be deemed to be properly filed.

**The following persons and entities need NOT file a Proof of Administrative Expense Claim:**

- a. Administrative claims based upon liabilities that the Debtor incurs in the ordinary course of its business to providers of goods and services;
- b. Any and all claims of a Professional<sup>1</sup> seeking an award by the Bankruptcy Court of compensation for services rendered or reimbursement of expenses incurred under sections 326, 330, 331, 503(b)(2), 503(b)(3), 503(b)(4) or 503(b)(5) of the Bankruptcy Code;
- c. Administrative claims arising out of the employment by the Debtor of an individual from and after the Petition Date, but only to the extent that such administrative claim is solely for outstanding wages, commissions, or reimbursement of business expenses; and
- d. the fees and charges assessed against the Debtor's estate, pursuant to 28 U.S.C. § 1930, including such fees or charges assessed against the Debtor's estate by the Office of the United States Trustee for the District of Nevada.

**PURSUANT TO BANKRUPTCY RULE 3003(C)(2), IF ANY PERSON OR ENTITY THAT IS REQUIRED TO FILE A PROOF OF ADMINISTRATIVE EXPENSE CLAIM AS SPECIFIED IN THE ADMINISTRATIVE CLAIM BAR DATE ORDER BUT FAILS TO DO SO ON OR BEFORE THE ADMINISTRATIVE CLAIM BAR DATE, THEN SUCH CLAIMANT SHALL BE FOREVER BARRED, ESTOPPED, AND ENJOINED FROM ASSERTING AN ADMINISTRATIVE EXPENSE CLAIM THAT AROSE OR ACCRUED ON OR AFTER THE PETITION DATE THROUGH AND INCLUDING THE ADMINISTRATIVE CLAIM BAR DATE.**

The Debtor reserves the right to dispute, or to assert offsets or defenses against, any Administrative Expense Claim, and nothing contained in the Administrative Claim Bar Date Order or this Notice shall preclude the Debtor from objecting to any filed Administrative Expense Claim on any grounds.

A copy of the Administrative Claim Bar Date Order is available for inspection during regular business hours at the Office of the Clerk of the Bankruptcy Court, United States Bankruptcy Court for the District of Nevada, 300 Las Vegas Blvd. South, Las Vegas, NV 89101 or by contacting Debtor's undersigned counsel.

Questions concerning the contents of this Administrative Claim Bar Date Notice and requests for Proof of Administrative Expense Claim forms should be directed to Debtor's undersigned counsel. Please note that Debtor's counsel is not permitted to give you legal advice. You should consult your own attorney for assistance regarding any other inquiries, such as questions concerning the completion or filing of a Proof of Administrative Expense Claim.

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<sup>1</sup> **"Professional"** means (a) any professional employed in the Chapter 11 Case pursuant to an order issued under sections 327 or 1103 of the Bankruptcy Code or otherwise, and (b) any and all professionals or other entities seeking compensation or reimbursement of expenses in connection with the Chapter 11 Case pursuant to section 503(b)(4) of the Bankruptcy Code

DATED this \_\_\_\_ day of June 2023.

By: \_\_\_\_\_

*Counsel for Debtor*